



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**
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April 7, 2006

VIA EMAIL AND USPS

Bruce P. Beausejour, Esq.
General Counsel
185 Franklin Street, 13th Floor
Boston MA 02110

RE: Investigation by the Department of Telecommunications and Energy on its own motion as to the propriety of the rates and charges set forth in the following tariff: M.D.T.E. No. 10, filed on February 3, 2006, to become effective March 5, 2006, by Verizon New England, Inc., d/b/a/ Verizon-Massachusetts, D.T.E. 06-26

Dear Attorney Beausejour:

Enclosed please find a second set of information requests issued by the Department of Telecommunications and Energy in the above-captioned matter. Please submit responses to the Department in hard copy and by email on or before 5:00 p.m., on Monday, May 8, 2006. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/
Carol M. Pieper
Hearing Officer

Encs.

cc: Service List

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON-MASSACHUSETTS, D.T.E. 06-26**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon New England, Inc., d/b/a Verizon-Massachusetts (“Verizon”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Verizon or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses as follows: (a) one original to Mary L. Cottrell, Secretary of the Department; and (b) four copies to Carol Pieper, Hearing Officer.

Requests

- DTE-2-1 In DTE 1-4, the Department asked Verizon to state the percentage of delinquent customers who are Lifeline and protected customers, respectively. In response, Verizon stated that it was unable to provide this information without further study. Please provide an estimate of the percentage of delinquent customers who are Lifeline and protected customers.
- DTE-2-2 In DTE 1-4, the Department asked Verizon to state the actual number of Lifeline and protected customers, respectively, that do not pay their bills on time, on a monthly basis, from January 2005. In response, Verizon stated that it was unable to provide this information without further study. Please provide an estimate of the number of customers who are Lifeline and protected customers since January 2005.
- DTE-2-3 In Verizon's original filing on February 3, 2006, the Company stated that at the end of 2005, "approximately 10% of Verizon MA's residence customer bills were paid one month late and 5% were paid two or more months late." For these two percentages, please provide an estimate of how many are Lifeline and protected customers.
- DTE-2-4 In response to DTE-1-6, Verizon provided calculations as to the cumulative effect on customers. The calculations do not appear to appropriately address the Department's question. To clarify the Department's original question, please quantify the increase in total charges that application of the late payment charge would have on Lifeline and protected customers, assuming those customers did not pay one month of bills, three month's worth of bills, six months worth of bills, and a full year of bills. For purposes of this question, assume that the customer's unpaid charges accumulated each month over the designated periods.